

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTEGRATED HEALTH SERVICES OF
CLIFF MANOR, INC., et al.

Plaintiffs-Counterclaim Defendants,

V.

THCI COMPANY LLC,

Defendant-Counterclaimant.

Case No. 04-910

**THCI COMPANY LLC'S MOTION FOR PRELIMINARY INJUNCTION WITH
REQUEST FOR EXPEDITED CONSIDERATION AND HEARING**

Upon the annexed Memorandum of Law, Affidavit of Igor M. Tsibelman, Esq., dated July 13, 2005, together with all prior proceedings in this case, Defendant-Counterclaimant THCI Company LLC (“THCI”) hereby moves this Court, the Honorable Gregory M. Sleet, at the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Room 4324, Wilmington, Delaware 19801, to be held at date and time to be specified by the Court, for an order directing Plaintiffs-Counterclaim-Defendants Integrated Health Services of Cliff Manor, Inc. and eight other subsidiaries¹ (“Plaintiffs”) of IHS Long-Term Care, Inc. (“LTC”) to vacate nine nursing homes (“Facilities”) currently leased from defendant-counterclaimant THCI Company LLC (“Defendant”); and enjoining Plaintiffs from making any payments or distributions to LTC or any other related entities pending surrender of the Facilities and resolution of this case.

For the reasons set forth in the accompanying Memorandum of Law, THCI respectfully requests that the Court expedite the hearing and determination of this Motion.

Dated: July 13, 2005
Wilmington, Delaware

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¹ Integrated Health Services at Riverbend, Inc.; Integrated Health Services at Somerset Valley, Inc.; Alpine Manor, Inc.; Briarcliff Nursing Home, Inc.; Integrated Health Group, Inc.; Spring Creek of IHS, Inc.; Firelands of IHS, Inc.; and Elm Creek of IHS, Inc.